

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., et al.,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD., WEST REALM SHIRES
SERVICES, INC., and ALAMEDA RESEARCH
LTD.,

Adv. Pro. No. 23-50759 (JTD)

Plaintiffs,

-against-

MIRANA CORP., BYBIT FINTECH LTD., TIME
RESEARCH LTD., SIN WEI “SEAN” TAN, WEI
LIN “GERMAINE” TAN, WEIZHENG YE, and
NASHON LOO SHUN LIANG,

Defendants.

SECOND DECLARATION OF WEISHENG CHEN

I, Weisheng Chen, hereby declare and state pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of defendant Mirana Corp.’s (“Mirana”) motion to dismiss the complaint. I am the Group Financial Controller for Mirana and have held that position since May 17, 2022. The statements in this declaration are based upon my personal knowledge, my review of records kept in the ordinary course of business by Mirana, and my review of Plaintiffs’ Memorandum of Law in Opposition to Defendants’ Motions to Dismiss Plaintiffs’

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. A list of Debtors and the last four digits of their tax identification numbers may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Complaint (Adv. Pro. D.I. 62) (the “Opposition”) and of exhibits 3-6 to the declaration of Matthew B. McGuire (Adv. Pro D.I. 63-3 to 63-6) each filed by Plaintiffs in the above-captioned adversary proceeding on April 8, 2024.

2. The following statement excerpted from page 15 of the Opposition contains multiple inaccuracies:

In February 2023, Mirana announced an investment in Seattle-based Kaito AI, an AI-optimized search engine, and in March 2023, Mirana announced an investment in Delaware-incorporated Eigen Labs. McGuire Decl., Exs. 3-6. Given the proximity between the withdrawals underlying this action and these investments, it is likely that Mirana invested portions of its withdrawals in these and other U.S.-based companies.

3. For example, Mirana has not made any investment in Kaito AI, Eigen Labs, or any other company, using digital assets withdrawn by Mirana from its account on the FTX.com exchange during the 90-day period prior to November 11, 2022 (“Withdrawn Digital Assets”), or using proceeds from any sale of Withdrawn Digital Assets.

4. On or about July 8, 2022, Mirana invested \$300,000 in Kaito Inc. (“Kaito AI”) pursuant to a SAFE, i.e., simple agreement for future equity (the “Kaito AI Investment”). Mirana did not make the Kaito AI Investment using Withdrawn Digital Assets or using proceeds from any sale of Withdrawn Digital Assets. Indeed, the Kaito AI Investment occurred over a month before the start of the 90-day period prior to November 11, 2022.

5. In March 2023, Mirana was issued certain shares of capital stock of Eigen Labs, Inc. (“Eigen Labs”) in exchange for a contribution of \$999,992.66 (the “Eigen Labs Investment”). Mirana did not make the Eigen Labs Investment using Withdrawn Digital Assets or using proceeds from any sale of Withdrawn Digital Assets.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 8th day of May, 2024



Weisheng Chen